GIA-NB-78-04718A002600340006-2/3 UNITED STATES GOVERNMENT

TO

STANDARD FORM NO. 64

DATE: 11 December 1957

25X1A9a

FROM



FLD NO.

CLASS

CLASS/X/DECLASS/

NEXT REV DATE 89

SUBJECT: Proposed course in the Writing of Regulations

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Outlined below are some rather rough ideas that may provide a place to start in developing the course in the writing of regulations. I would appreciate it if you, and others who have an interest in the problem would comment on these ideas and would make any additional suggestions that might be helpful.

- If the second meeting of the course were a three-hour seminar on the problems of regulatory issuances (not only actual writing problems), would it be possible to have present as a "consultant" a person qualified and authorized to discuss regulations problems and the Agency policies concerning them? The "consultant" would be pre-briefed on the kinds of questions that would be likely to come up during the seminar, and the course instructor would act as chairman of the meeting.
- 2. Could the following kinds of material be made available for the course?
 - Documented case histories of the development of some regulations -- original drafts, various revisions, final products, and modifying Notices or Handbooks.
 - Samples of regulations that have caused trouble because of differences in interpretation.
 - Samples of "regulations-in-the-making" problems -regulations that are currently in the process of development.
 - Samples of regulations problems that are likely to arise in the future or problems that probably would arise under certain conditions -- brush-fire hot war, expansion or contraction of Agency function, and the like.
- Do the following kinds of exercises appear to meet the needs of that part of the course concerned with the actual writing of regulatory issuances?
 - Rewriting of selected regulations to remove jargon and excess wordage.

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- b. Rewriting of selected regulations to eliminate ambiguity and the possiblity of misunderstanding.
- c. Drafting regulations to meet a given set of requirements.
- d. Redrafting regulations formulated by other members of the class.
- e. Final drafting of regulations after group coordination (three or four students to function as a coordinating group).
- f. Drafting regulations to meet a given set of requirements, including Handbook supplementation, and outlining the necessary Handbook material.

When I have your comments and suggestions I shall work out a tentative detailed plan for the course. If that plan appears to be practicable, we can go ahead with a trial run.

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